

**DATE:** May 3, 2023

**March 31, 2023 January 9, 2023** 

### OPERATIONS MEMORANDUM #23-01-01

**SUBJECT:** Revised Information Updates Received from Managed Care Organizations

(MCOs)

**TO:** Executive Directors

FROM: Tanoa Fagan

Director

**Bureau of Operations** 

## **PURPOSE**

To provide instruction to County Assistance Office (CAO) staff on how to handle information updates received from an MCO.

#### **BACKGROUND**

MCOs may receive updated contact and household information for individuals enrolled in Medical Assistance (MA) and Children's Health Insurance Program (CHIP) from their members or from providers who treat their members. For non-Long-Term Care (LTC) related MA, they send the updated information to the Department of Human Services using a CAO notification form. CAOs will start receiving this form from both MA and CHIP MCOs.

#### **DISCUSSION**

MCOs will begin sending an updated MCO Change in Family Status/Address CAO Notification Form (Attachment 1) to the CAO's resource accounts for non-LTC-related MA and CHIP recipients. The CAO Notification Form will provide information such as:

- Changes in household composition
- Homeless indicator
- A new phone number
- A new address

- Pregnancy information
- Death Information

This form also includes a field for the MCO to indicate how this information was obtained and the date the information was received.

Since address changes for recipients of Home and Community-Based Services (HCBS) often require notification to and coordination of multiple providers, address changes for HCBS recipients will continue to be provided via the HCBS Eligibility/Ineligibility/Change Form (PA 1768). Since address changes for LTC facility recipients often require closure of a LTC facility category and review for either HCBS or non-LTC-related MA, address changes will continue to be provided via the LTC Admission and Discharge Transmittal Form (MA 103).

If the CAO does receive a CAO Notification Form from an MCO for an HCBS or LTC facility recipient the CAO should narrate receipt of the form, reach out to the recipient, HCBS provider or LTC facility to verify the information reported on the form and request submission of the PA 1768 or MA 103.

To assist with unwinding for the end of the Public Health Emergency (PHE), the United States Department of Agriculture's Food and Nutrition Service has approved Pennsylvania for a waiver to allow households with a verified change of address that do not provide updated shelter and utility costs, to continue using the shelter and utility costs already being adjusted to their case until the household's next Semi-Annual Report (SAR) or renewal. This waiver is effective beginning April 1, 2023 and continues through March 31, 2024.

# **CAO Procedure**

If the CAO Notification Form contains information that is different from the information currently on file, the CAO will take the following actions depending on the information received on the CAO Notification Form and what benefits are on the case:

MA-only, CHIP-only, MA and CHIP combo cases and MA/Supplemental Nutrition
Assistance Program (SNAP) combo cases, CHIP/SNAP combo cases, and
CHIP/MA/SNAP combo cases

- If a change in household composition is reported:
  - The CAO will contact the household by phone to confirm the change.
     If unable to contact by phone, the CAO will contact the household in writing to request necessary information and allow at least 10 calendar days for response.
  - If the SNAP household is not enrolled in SAR and no information/verification is received, the CAO will close SNAP with

reason code 042 (Failure to Provide Information). If the SNAP household is enrolled in SAR, the reported information will be reviewed at the next SAR or Renewal.

- If no information/verification is received, the CAO will take the following action on MA and CHIP budgets, in which a change in household composition would affect MA or CHIP eligibility:
  - Individuals in MA budgets that were maintained due to the continuous coverage requirement during the PHE may not be closed during the unwinding period except at renewal.
  - Individuals in MA budgets not maintained due to the PHE can be closed during the unwinding period if no longer eligible.
    - See Ops Memo #23-03-03, for more information on MA budget processing for maintained and non-maintained individuals.
  - Individuals in CHIP budgets may not be closed until renewal due to continuous eligibility for children under 19. Reported information will be reviewed at the next renewal.
- If a change in household composition would not affect MA or CHIP eligibility, the CAO will enter a narrative in case Comments and keep MA and CHIP open without making changes in the Electronic Client Information System (eCIS).
- If the CAO notification form reports that an individual is homeless:
  - The CAO will contact the client using any available contact options and allow at least 10 calendar days for a response for all written requests. Contact will be made to confirm homeless status with the individual and make any needed updates in eCIS. If unable to confirm, the CAO will narrate the attempt and keep benefits open and review at the next renewal or SAR.
- If an in-state change of address or phone number is reported and it was received through a phone call or a letter from the member, an authorized representative, or other adult member:
  - The CAO will consider this verified upon receipt and will update the information in eCIS with the information received if the information provided by the MCO is more recent than any information on file and is not questionable.

- The CAO will request updated shelter and utility costs for SNAP and allow at least 10 calendar days for response. If the household fails to respond, the address should be updated, but the shelter and utility expenses should remain on the case and should be reviewed at the next SAR or renewal.
- If an in-state change of address or phone number is reported and the
  information was obtained by an MCO through a source other than the
  member, an authorized representative, or other adult member <u>OR</u> if an out-ofstate change of address is reported from any source indicated on the CAO
  notification form:
  - The CAO will confirm the information with the household by phone. If the CAO is unable to reach the recipient by phone, the CAO will contact the household in writing to request confirmation of the updated contact information and updated shelter and utility costs. If the MCO reports a change in telephone number only, the CAO does not need to reach out and request updated shelter/utility costs. The CAO will send to both the address in the system and the address reported on the CAO notification form.
  - o If the SNAP household is not enrolled in SAR and no verification is received, the CAO will close SNAP with reason code 042 (Failure to Provide Information). If the SNAP household is enrolled in SAR, the CAO will retain the current shelter and utility costs and review these and the change of address at the next SAR or renewal. The SNAP benefits must remain open as they are not required to report a change of address except at SAR or Renewal. If the change of address is not reported during SAR or Renewal, the CAO will need to send a request to the household to verify their address.
  - If no information/verification is received, the CAO will take the following action on MA and CHIP budgets:
    - Individuals in MA budgets that were maintained due to the continuous coverage requirement during the PHE may not be closed during the unwinding period except at renewal.
    - Individuals in MA budgets not maintained due to the PHE can be closed during the unwinding period if no longer eligible.
      - See Ops Memo #23-03-03, for more information on MA budget processing for maintained and non-maintained individuals.

- Individuals in CHIP budgets may not be closed until renewal due to continuous eligibility for children under 19. Reported information will be reviewed at the next renewal.
- If pregnancy information is reported, the CAO will update eCIS with the information received on the form.
- If death information is reported:
  - For an MA-only, CHIP-only, or MA/CHIP combo cases, the CAO will accept the information as verified and close the individual's MA or CHIP.
  - For MA/SNAP combo cases, CHIP/SNAP combo cases, or MA/CHIP/SNAP combo cases, the CAO will verify death information. If the CAO is unable to verify electronically, the CAO will request verification and allow at least 10 calendar days for response. If verification is not received, the CAO will close the individual's MA and CHIP benefits. If the SNAP household is not enrolled in SAR, the CAO will close the SNAP benefits. If the SNAP household is enrolled in SAR, the CAO will remove the deceased individual and any income for that individual from the case, adjust SNAP benefits accordingly, and send a notice to the remaining SNAP household.

Temporary Assistance for Needy Families/MA/CHIP Combo cases

The CAO is required to act on all reported changes and will reach out to the household to conduct a case review and request verification of the information provided on the form no later than 10 calendar days after receipt.

- As needed, the CAO may conduct a partial renewal by telephone or by mail if the review focuses on changes. The client may submit verification later.
- The CAO may accept a new phone number without additional verification if it was received directly from the member, an authorized representative, or other adult member.

#### **NEXT STEPS**

- 1. Review this Operations Memorandum with appropriate staff.
- 2. Direct all questions to your area manager.

## **ATTACHMENT**

Attachment 1: MCO Change in Family Status/Address CAO Notification Form